

EXHIBIT 2

1

2 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----x
3 In re: Terrorist Attacks on
4 September 11, 2001.
4 -----x
5 KATHLEEN ASHTON, et al.,
6
6 Plaintiffs,
7
7 v. 03 MD 1570
8 (RCC)
8
9 EGYPTIAN ISLAMIC JIHAD, et
9 al.,
10
10 Defendants.
11 -----x
11 July 27, 2007
12 9:55 a.m.
12
13 Before:
13
14 HON. FRANK MAAS,
14
15 Magistrate
15 Judge
16
17
18 Deposition of LAWRENCE G. SMITH, taken
19 by plaintiffs, pursuant to order of Hon. Frank
20 Maas, at the Daniel Patrick Moynihan Courthouse,
21 500 Pearl Street, New York, New York, before
22 Carol E. Ganley, a Certified Shorthand Reporter
23 and Notary Public of the State of New York.
24
25
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2 APPEARANCES
2
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10 with establishing or setting up SNCB in 1992?
 11 A. No.
 12 Q. Did you have any business with SNCB
 13 from 1992 to '94 when they moved into the same
 14 building, or you moved in the same building,
 15 those two years?
 16 A. No, that I remember.
 17 Q. Did you have any understanding up
 18 until 1994 as to what SNCB's purpose was, why
 19 they were established?
 20 A. No, I did not.
 21 Q. Were you aware by 1994 that some of
 22 the same people that worked for NCB were working
 23 for SNCB?
 24 A. Yes.
 25 Q. And who were those people that you
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1 77rWterD Smith
 2 were familiar with?
 3 A. John Bouckley.
 4 Q. I'm sorry. Did he have a title at
 5 SNCB?
 6 A. I don't know. Tom Crowley, Virginia
 7 Pensa. Those were three people who had worked
 8 at the branch who I remember being there. There
 9 were others, but I don't remember them working
 10 at the branch, in other words, having worked for
 11 NCB earlier.
 12 Q. Those three people worked for the NCB
 13 branch that you also worked for and were now, by
 14 '94, working for the SNCB entity in New York,
 15 correct?
 16 A. Those three, yes.
 17 Q. And there may have been others, but
 18 you don't recall, is that what you're saying?
 19 A. I don't recall any others who were
 20 branch employees. There were other employees
 21 down at SNCB. There was a woman, I can't
 22 remember. There was a man named Jagan Reddy.
 23 There may have been a computer person. I don't
 24 remember. But I remember particularly Ginger,
 25 Tom, and John because I had known them at the
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1 77rWterD Smith
 2 branch.
 3 Q. You mentioned Jagan Reddy. He was a
 4 former employee of NCB and was then an SNCB
 5 employee?
 6 A. I don't remember him as an SNCB